

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

GRACE ELIZABETH MILLER,  
CATHERINE SCHAEFER,

Defendants.

**DECLARATION OF BROCK FREDIN**

Case No. 18-CV-466

STATE OF WISCONSIN            }  
  ss:  
COUNTY OF SAINT CROIX       }

BROCK FREDIN, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-captioned proceeding. I submit this declaration in support of my compliance with this Court's March 17, 2020 discovery Order directing me to search all computers delivered to Defendants on April 16, 2020. For the reasons stated herein and within my discovery compliance dated April 16, 2020, Defendants have been fully provided with all responsive documents, interrogatories, and information within my possession.

**AUTHENTICATION OF DOCUMENTS**

2. Attached hereto as **Exhibit A** is a true and correct copy of the April 16, 2020 email to Karl Johann Breyer and Adam C. Ballinger delivering discovery with a

Dropbox.com link in *Fredin v. Miller*, Case No. 18-CV-466 and *Fredin v. Middlecamp*, Case No. 17-CV-3058.

3. Attached hereto as **Exhibit B** is a true and correct copy of the April 16, 2020 discovery delivery to the organized Dropbox.com account.

**March 17, 2020 Discovery Order Compliance**

4. Upon information and belief, I previously fully provided organized timely discovery pursuant to the Court's November 15, 2020 deadline. [Dock. No. 91]

5. I provided responsive documents and interrogatory answers relevant to this Court's March 17, 2020 Order on April 16, 2020.

6. Upon information and belief, I searched all previously unsearched computers, phones, and hard drives. This search occurred between March 17, 2020 and April 16, 2020. The documents were fully provided within Dropbox.com and by email.

7. All identified responsive documents related to specific interrogatories are contained in the November 15, 2019 Discovery folder for Document Request 13. Document Request 13 states "All documents identified, or for which identification was requested, in response to Defendants' Interrogatories."

8. Upon information and belief, I provided responsive documents and interrogatory answers relevant to this Court's March 17, 2020 Order 2(a) which states in part: "all online profiles, identities, usernames, or other identifiers". The responsive documents were included within November 15, 2019 Discovery Folder 13 > Interrogatory 1. Folder 13 is the catch-all folder to identify documents relevant to a specific interrogatory.

9. Upon information and belief, I provided responsive documents and interrogatory answers relevant to this Court's March 17, 2020 Order 2(b) which states in part: "all addresses where you have resided from 2016 to the present." The responsive documents were included within November 15, 2019 Discovery Folder 13 > Interrogatory 10. Folder 13 is the catch-all folder to identify documents relevant to a specific interrogatory.

10. Upon information and belief, I provided responsive documents and interrogatory answers relevant to this Court's March 17, 2020 Order 2(c) which states in part: "re-produce all of the responsive documents in a form that is organized and labeled to directly refer and correspond with the requests..." The responsive documents were all organized by Document Request Number. Moreover, I provided answers to each interrogatory. Folder 13 is the catch-all folder to identify documents relevant to a specific interrogatory.

11. Upon information and belief, I provided responsive documents and interrogatory answers relevant to this Court's March 17, 2020 Order 2(d) which states in part: "resume or curriculum vitae." The responsive documents were provided within November 15, 2019 Discovery Folder 15.

12. Upon information and belief, I provided responsive documents and interrogatory answers relevant to this Court's March 17, 2020 Order 2(e) which states in part: "medical evaluations of his emotional distress." The responsive documents were provided within November 15, 2019 Discovery Folder 8.

13. Defendants completely misled this Court in their February 7, 2020 First Motion for Sanctions. [Dock. No. 102] I fully provided discovery in the form of

responsive documents and answers to interrogatories. This included the revenge pornography BlackOutX2 and EpicViewF12 profiles created by Catherine Schaefer and her surrogates. This was contained in November 15, 2020 Folder 1.

14. Upon information and belief, Defendants began using the information provided in discovery to immediately continue their doxing campaign by reporting each online profile. This is an alleged violation of the Court's October 25, 2019 protective order.  
[Dock. No. 91]

Dated: April 16, 2020  
Saint Croix County, WI

A handwritten signature in dark ink, appearing to read "Brock Fredin", written in a cursive style.

s/ Brock Fredin

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Brock Fredin  
Hudson, WI  
(612) 424-5512 (tel.)  
brockfredinlegal@icloud.com  
*Plaintiff, pro se*

# EXHIBIT A

Fredin v. Middlecamp, Case No. 17-CV-3058; Fredin v. Miller, Case No. 18-CV-466

To: Ballinger, Adam C., Breyer, K. Jon

See attached. Let me know *immediately* if you have difficulty accessing the below described files.

Main Discovery Folder: <https://www.dropbox.com/>  
November 15, 2019 Discovery: <https://www.dropbox.com/>  
April 16, 2020 Discovery: <https://www.dropbox.com/>



466.pdf










3058.pdf

# **EXHIBIT B**

Overview

Hide

[Click here to describe this folder and turn it into a Space](#)[Show examples](#)[Create new file](#)

Name ↑	Modified ▼	Members ▼	
 466	--	Only you	...
 3058	--	Only you	...
 April 16, 2020 Discovery	--	Only you	...
 November 15, 2019 Discovery	--	 Only you	...
 466.zip	9/30/2019 11:54 pm	Only you	...
 3058.zip	9/30/2019 11:59 pm	Only you	...